

June 18, 2004

Pam Grubaugh-Littig
Permit Supervisor
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801

RE:

Response to the Division's TA Regarding the Submittal of the HCI Ground Water Model, Canyon Fuel Company, LLC, Skyline Mine, C/007/005, Task ID

#1752

Dear Ms. Grubaugh-Littig:

Please find enclosed with this letter Skyline Mine's response to the Division's May 2004 TA regarding the submittal of the additional data for the HCl Ground Water Model. This submittal includes completed C1 and C2 forms, four redline/strikethrough copies of modified text, and seven clean copies of text. I believe the deficiencies presented in the two informal TA's have been addressed. I have included with this letter an explanation by HCl regarding how items # 3 and #5 on Paul Clark's (OSM) were or were not addressed.

I appreciate your patience in allowing extra time for the preparation of this submittal. If you have any questions, please call me at (435) 448-2669.

Sincerely,

Chris D. Hansen

Environmental Coordinator Canyon Fuel Company, LLC

enclosures

File in:
C1007C005 2004, Judomeing
Refer to:
Confidential
Shelf

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JUN 1 8 2004

DIV. OF OIL, GAS & MINING

APPLICATION FOR COAL PERMIT PROCESSION

That Change New Perint Renewal Exploration	_ Bond Release	I ransier		
'ermittee: Canyon Fuel Company, LLC		3/05/05		
Mine: Skyline Mine Title: HCI Model TA Response	Permi	t Number: C/007/005		
Description, Include reason for application and timing required to implement	it:	7 . 16 11		
Modifications to the M&RP as requested by DOGM regardi	ng the HCI Ground V	Vater Model.		
Instructions: If you answer yes to any of the first eight (gray) question	ns, this application may re	quire Public Notice publication.		
Yes No 1. Change in the size of the Permit Area? Acres: Yes No 2. Is the application submitted as a result of a Division 3. Does the application include operations outside a policy of the Permit Area? Acres: Yes No 3. Does the application include operations outside a policy of the Application include operations outside a policy of the Application require or include public notions of the Application require or include ownership, and the Application require or include ownership, and the Application submitted as a result of a Violation of the Permit Area? Acres: Yes No 6. Does the application require or include public notions of the Application require or include ownership, and the Application submitted as a result of a Violation of the Permit Area? Acres: Yes No 7. Does the application require or include ownership, and the Application require or include ownership, and the Application submitted as a result of a Violation of the Permit Area? Acres: Yes No 10. Does the application require or include ownership, and the Application submitted as a result of a Public roa. Yes No 11. Does the application affect the surface landowner of the Permit Area? Acres: 12. Is the application require or include ownership, and the Application require or include ownership, and the Application affect the surface landowner of the Application require or include collection and the Application affect the surface landowner of the Application require or include collection and the Application affect the surface landowner of the Application require or include collection and the Application affect the surface landowner of the Application require or include collection and the Application affect the surface landowner of the Application require or include collection and the Application affect the surface landowner of the Application require or include collection and the Application affect the Surface landowner of the Application require or include collection and the Application affect the Permit Application affect the Permit Application a	n Order? DO# reviously identified Cump gic basins other than as cup totion or increase of insurate publication? control, right-of-entry, or dor cemetery or 300 feet on? NOV # res or regulations or policies or change the post mining and design or mine sequence and reporting of any basely regetation outside the coal, storage or placement? monitoring, removal or removatoring, sediment or drainal signs, maps or calculation control or monitoring?	alative Hydrologic Impact Area? arrently approved? nce or reclamation bond? compliance information? of an occupied dwelling? es? land use? the and timing? (Modification of R2P2) ine information? the arrent disturbed area? vegetation activities? al of surface facilities? alge control measures? tharges to a stream?		
Please attach four (4) review copies of the application. If the mine is (5) copies, thank you. (These numbers include a copy for the Price Field Office)	on or adjacent to Fores	t Service land please submit five		
I hereby certify that I am a responsible official of the applicant and that the information co	ntained in this application is true	e and correct to the best of my information		
and belief in all respects with the laws of Utah in reference to commitments, undertakings,		1 15- 01		
DANIEL R MEADORS UN-mine many - 6-15-0				
	Sign Name, Position, Date			
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DIV. OF OIL, GAS & MINING

Form DOGM- C1 (Revised March 12, 2002)

APPLICATION FOR COAL PERMIT PROCESING Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permitt		Fuel Company			C 1007 1005		
Mine:	Skyline Mine	4.70	Permi	it Number:	C/007/005		
Title:	HCI Model T	A Response					
applicati of conter	on. Individually ats, section of the	list all maps a plan, or other	to the Mining and Reclamation Plan, which is required and drawings that are added, replaced, or removed from the information as needed to specifically locate, identify and an and drawing number as part of the description.	ne plan. Included in the ex	de changes to the table isting Mining and		
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				r	IV. OF OIL, GAS & MINING		

June 1, 2004 HCI-1787

Mr. Chris Hansen Canyon Fuel Company, LLC HC 35 Box 380 Helper, UT 84526

SUBJECT: Transmittal of Supplemental Modeling Report

Dear Mr. Hansen:

This letter accompanies a pdf-format copy of a report on supplemental modeling of ground-water flow in and around the Skyline Mine. The modeling was performed and the report prepared by Hydrologic Consultants, Inc. of Colorado (HCI) at the request of Canyon Fuel Company.

The report specifically addresses eight comments and recommendations (deficiencies) submitted by Utah Division of Oil Gas and Mining (DOGM, 2004) pertaining to earlier Skyline groundwater flow modeling (HCI, 2003). Most of the deficiencies and recommendations are addressed in the accompanying report. Those items that were not fully addressed as requested include:

- 1. Item #3 requested a figure representing each layer in the model. HCI prepared 5 such figures, however, several other layers were not represented in separate figures because those layers are redundant (several identical layers, for numerical reasons, representing identical geology).
- 2. Item #5 requests extension of cross sections to show the geology east and west of major faults. However, the cross sections in question are of the model grid, and the faults coincide with the model boundaries. Therefore, no extension is possible there is no model beyond the model boundary. A geological cross section from Cris Kravits' report would better satisfy DOGM's request.

All other items were addressed in full. Please give me a call if you have questions regarding the accompanying report.

Sincerely,

HYDROLOGIC CONSULTANTS, INC. OF COLORADO

Roger L. Howell Project Manager

References:

- Hydrologic Consultants Inc., 2003, Findings of ground-water flow modeling of Skyline Mine and surrounding area, Carbon, Sanpete, and Emery Counties, Utah: report prepared for Manning, Curtis, Bradshaw & Bednar LLC, September.
- Utah Division of Oil, Gas, and Mining, 2004, Findings for HCI ground-water model report in PHC, Canyon Fuel Company, LLC, Skyline Mine, C/007/0005 #1871: Letter to Dan Meadors, April 23.